

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

Jefferson Griffin

Plaintiff,

v.

North Carolina State Board of Elections,

Defendants,

and

Allison Riggs, VoteVets Action Fund, North  
Carolina Alliance for Retired Americans,  
Sarah Smith, and Juanita Anderson,

Intervenor-Defendants

Case No. 5:24-cv-731-M

North Carolina Democratic Party,

Plaintiff,

v.

North Carolina State Board of Elections, *et al.*,

Defendants.

Case No. 5:24-cv-699-M

Carrie Conley, Lockhart Webb, and Ella  
Kromm, *individually and on behalf of all  
others similarly situated*; Gabriela Adler-  
Espino; and the League of Women Voters of  
North Carolina,

Plaintiffs,

v.

Alan Hirsch, Jeff Carmon, Stacy Eggers IV,  
Kevin N. Lewis, and Siobhan O'Duffy Millen,  
*in their official capacities as members of the  
North Carolina State Board of Elections*, and  
Karen Brinson Bell, *in her official capacity as  
Executive Director of the North Carolina State  
Board of Elections*,

Defendants.

Case No. 5:25-cv-193-M

## **SUPPLEMENTAL DECLARATION OF CATHERINE LAWSON**

1. My name is Catherine Lawson. I am an adult and under no disability. The facts stated in this declaration are known to me personally, unless otherwise specifically stated.

### **I. Statements From April 14, 2025 Declaration**

2. This declaration supplements my declaration submitted in this action on April 14, 2025. For the Court's convenience, the facts set out in my April 14, 2025 declaration are restated verbatim (with the exception of footnote 2, an updated Exhibit A, and any corrections to typographical errors), in paragraphs 3-27.

3. I am the Director of Voter Protection and Strategic Counsel for the North Carolina Democratic Party ("NCDP"), the Plaintiff in this action. In my capacity as Director of Voter Protection, I have led NCDP's voter protection programs for the 2024 general election. These programs include counseling interested voters and volunteers on election participation, hosting candidate and voter-registration events, staffing voting-protection hotlines, educating voters on how to cast their ballots, and assisting voters in curing deficiencies in their ballots during the canvass period.

4. Because the 2024 general election was the first federal and statewide general election implementing North Carolina's recent photo identification requirements, NCDP relied upon the state's photo identification statutes and regulations to ensure voters were educated on when they were required to provide photo identification.

5. Effective August 1, 2023, the North Carolina State Board of Elections (the "State Board") promulgated a temporary regulation (later made permanent) that voters casting

military-overseas ballots were “not required to submit a photocopy of acceptable photo identification.” 8 N.C. Admin. Code 17.0109(d).

6. NCDP relied upon this regulation in counseling military and overseas voters how to cast their ballots in the 2024 general election. NCDP’s voter-education resources, such as the voter-protection manual its volunteers use, instructed volunteers that military and overseas voters were not required to provide photo identification (or a so-called “reasonable-impediment” form) when submitting their military-overseas ballots. Likewise, NCDP trained its volunteers to answer questions from or about military and overseas voters on NCDP’s voter-assistance hotline and instruct these voters they were not required to provide photo identification or a reasonable-impediment form.

7. North Carolina’s military and overseas voters, including voters who cast ballots for Justice Allison Riggs (NCDP’s nominee for Associate Justice of the North Carolina Supreme Court), likewise relied upon the State Board’s regulations in voting last November. They authenticated their identity by submitting a declaration, not photo identification or an exception form, with their ballots.

8. In fact, to my knowledge, voters who voted using military-overseas ballots had no opportunity to submit photo identification or an exception form prior to the election. Under state law, military and overseas voters may vote using a federal write-in absentee ballot or an electronic portal created by the State Board. Neither method of casting a military-overseas ballot allowed for voters to submit photo identification or an exception form.

9. Based upon the final absentee-ballot statistics prepared by the State Board on November 26, 2024, 10,500 North Carolina military servicemembers and 21,533 other North Carolinians abroad cast military-overseas ballots in the 2024 general election.

10. On November 19, 2024, Judge Jefferson Griffin, the Republican challenger to Justice Riggs, filed over 300 election protests across the state in connection with his loss in the election to Justice Riggs. One category of protests asserted, for the first time and weeks after the polls closed, that military and overseas voters were required to submit copies of their photo identification or an exception form (the “Photo ID Protests”). Another alleged that counting the votes of overseas voters who checked a box on a voter registration form that they have never “lived” in the United States violated the state constitution (the “Residency Protests”).

11. Judge Griffin filed the Photo ID Protests only in a handful of counties, each with large populations of Democratic voters. Only the approximately 1,400 voters Griffin challenged in Guilford County, moreover, were protested by November 19, 2025, the statutory deadline to file an elections protest. Judge Griffin subsequently submitted challenges to around 4,000 military and overseas voters from Buncombe, Durham, and Forsyth counties whose votes he contends should be discarded.<sup>1</sup> According to the State Board’s tally, Justice Riggs earned 62.2% of the total vote in Guilford County, 63.7% in Buncombe County, 81.7% in Durham County, and 57.5% in Forsyth County.

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<sup>1</sup> The State Board has provided lists of challenged voters on its website, at <https://www.ncsbe.gov/information-voters-challenged-election-protest#1Whichvotershavebeenchallenged-4570>.

12. The Photo ID Protests are purely technical—none included any evidence that challenged military or overseas voters were not who they identified themselves to be. Every such voter was required to submit a declaration with his or her ballot authenticating his or her identity.

13. On April 4, 2025, almost five months after the 2024 general election, the North Carolina Court of Appeals endorsed Judge Griffin’s interpretation of state law, holding that 8 N.C. Admin. Code 17.0109(d) was inconsistent with Articles 20 and 21A of Chapter 163 of the North Carolina General Statutes. Based on this interpretation, the Court of Appeals ordered that the military and overseas voters targeted by the Photo ID Protests must “cure” their ballots by providing a photocopy of their approved identification or a reasonable-impediment form to their county boards of elections.

14. The Court of Appeals further ordered that voters subject to the Residency Protests were ineligible to vote, and it instructed the State Board to discard those votes, without providing the affected voters any notice or opportunity to be heard before being denied their right to vote.

15. On April 11, 2025, the North Carolina Supreme Court modified the Court of Appeals’ order to require voters subject to the Photo ID Protests to provide photo identification or a reasonable-impediment form within 30 calendar days of the county boards of elections mailing out notices for these voters’ ballots to count.

16. The North Carolina Supreme Court declined to review the Court of Appeals’ decision with respect to Residency Protests.

17. NCDP will be irreparably harmed if military and overseas voters are subjected to the cure process and vote deletion mandated by the state courts.

18. NCDP nominated Justice Riggs, and any alteration to the vote count that jeopardizes her win irreparably harms NCDP's interest in electing its candidates.

19. Further, as a political party, NCDP's staff, volunteers, time, and financial resources ordinarily would be spent on organizing, educating and engaging voters in preparation for the 2025 municipal and 2026 statewide elections. If the State Board is not immediately enjoined from carrying out orders of the state court, NCDP will be forced to divert significant resources from organizing and other party activities to educating and assisting potentially thousands of military and overseas voters on how to submit photo identification or reasonable-impediment forms to their county boards of elections. NCDP estimates that the time and expense the cure process will immediately incur in the absence of preliminary relief include tens of thousands of dollars in staff salaries, programming, and legal support, as well as hundreds of hours of volunteer time. Once expended, NCDP cannot recover these lost funds.

20. NCDP's members will also be irreparably harmed if the cure process and vote discarding are not immediately enjoined.

21. Some voters subject to the ordered cure process in connection with the Photo ID Protests will be unable to comply because they have died, cannot be contacted, or cannot access a computer. For example, Captain Rebecca M. Lobach, a resident of Durham challenged by Judge Griffin, cast her ballot in accordance with the laws in effect during the 2024 general election. Captain Lobach was aboard the UH-60 Blackhawk helicopter

that collided with an airplane near Reagan Washington National Airport on January 29, 2025, and died in the crash. Her vote (and votes cast by those like her) should count, notwithstanding that she cannot posthumously comply with the state court's order.

22. Based on my experience in voter protection, the 30-day cure process will not provide an adequate opportunity to cure for many military and overseas voters who are in remote locations without easy access to the physical or email address they used to vote six months ago. Others may not comply because contacting these voters is exceptionally difficult. NCDP cannot door-to-door canvass voters stationed or living abroad; cannot easily phone bank international numbers; and does not have access to the State Board's email database (which is not made publicly available under state law). As discussed, mail likely will not be an effective means for communicating with voters who are living abroad and voted electronically.

23. The voters targeted by the Residency Protests are not subject to the cure process. The State Board will delete these voters' votes unless enjoined from doing so by this Court.<sup>2</sup>

24. Deleting these votes will irreparably harm the NCDP and its members. NCDP has an interest in electing its candidates, including Justice Riggs, which interest will be irreparably injured if Justice Riggs' victory is altered by discounting these votes.

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<sup>2</sup> On April 15, 2025, the State Board filed a notice in this consolidated litigation (DE 61) setting forth "how it intends to approach [the] administrative remedial process" ordered by the North Carolina Supreme state courts "unless and until directed to do otherwise by court order." The following day, Judge Griffin filed a petition for writ of mandamus and alternative motion to clarify mandate in the North Carolina Court of Appeals challenging the Board's intended approach. Dkt. 5:24-cv-00731-M-RJ, ECF 76 (notice of state court filing). As Judge Griffin's mandamus petition and motion remain pending, the Board's ultimate approach is unclear.

25. Additionally, unlike the voters subject to the Photo ID Protests, the overseas voters subject to the Residency Protests have not received notice that their votes will be discarded. They have not been given any opportunity to show that the allegations in Judge Griffin's Residency Protests are incorrect or that they are residents of North Carolina for voting purposes under N.C. Gen. Stat. § 163-258.2 or another provision of state law.

26. Judge Griffin's Residency Protests have incorrectly named North Carolinians as "never residents" when in fact those voters have resided in North Carolina. A copy of a recent news story identifying 16 of these voters is attached as **Exhibit A**.

27. Voters' ballots should not be discarded on the assumption that Judge Griffin's protests are factually accurate.

## **II. Developments Since April 14**

28. Since the Court issued a preliminary injunction in this now-consolidated matter, there have been several recent news reports indicating that Judge Griffin has erroneously challenged many voters as "never residents," including:

a. Josey Wright, a 25-year-old Ph.D. student studying in the United Kingdom.

According to news sources, Ms. Wright lived in North Carolina from early childhood until age 18. Her parents still live there, and she visits most years, typically spending summers there. She voted from abroad using a web portal available to US citizens who now live overseas, as she has done in several local and national elections since she moved to the UK to study.

- b. Josiah Young, 20, who was studying abroad in Spain during the 2024 general election. Mr. Young attended community college in North Carolina and runs a drone photography business in the state. He voted in North Carolina, and his permanent residence is in Jackson County.
- c. Neil McWilliam, who taught at Duke University for two decades before moving to France with his family in 2023. Originally from the United Kingdom, McWilliam, his wife and his son were naturalized in 2013, and he has voted in every state and federal election since. He is a Democrat, and his wife is registered as an independent. His vote was challenged, and hers was not.
- d. David Eberhard, a former North Carolina resident who moved to Italy for his son's education but still owns his home in the state and intends to return. He voted while living in Italy in 2024 using the online forms provided by local officials, he said.
- e. Vidyaranya Gargya, a retired professor who taught at UNC-Greensboro for 30 years and who, according to the school, has visited every college in the state. He's paid property taxes at the same suburban Guilford County home he's owned since 2003, according to public records. And voting records show he voted in-person on Election Day eight times without issue, and has voted in every midterm and presidential general election since 2006. He appears to have cast an overseas mail-in ballot for the 2024 election.
- f. Derrick Raphael, who attended law school at Duke University from 2009-12 and worked in North Carolina for years after graduating. Raphael voted in person in

North Carolina from 2006 to 2014. He has since been living and working in Canada with his spouse, but maintains his permanent residence in North Carolina.

g. Cameron Avila, a postal worker based in Jacksonville, North Carolina.

h. Abdulai Conteh, an army mechanic at Fort Bragg, North Carolina.

29. Judge Griffin's "never resident" protests challenged 259 unique voters. Based upon the publicly available information I have been able to obtain, at least 32 appear to have been wrongfully accused of being "never residents." My sources of information include:

a. News articles reporting individual voters who reside in North Carolina;

b. National change of address data showing voters on the "never resident" list moved from one address in North Carolina to another address in North Carolina; and

c. Voter history data indicating voters on the "never resident" list voted domestically by mail, in person at early voting, or in person on election day in at least one election prior to the 2024 general election under claim of residency in their county.

30. I have reviewed the notice filed by North Carolina State Board of Elections in this matter on April 15, 2025 (DE 61). I have also reviewed the response to the State Board's notice filed by Judge Griffin on April 16, 2025 (DE 76).

31. The State Board's independent analysis corroborates my testimony that Judge Griffin has wrongfully included voters in his "never resident" protests. A sample internal review the Board conducted of the voter history of the supposed "never resident" voters

identified by Judge Griffin also indicates that some have resided in North Carolina previously. (DE 61 p.4 n.6).

32. As the Director of Voter Protection and Strategic Counsel for the NCDP, I have worked with our staff and volunteers to craft a cure program and identify potential pitfalls with the State Board's cure process, some of which I describe below. Based on my experience in voter protection, it remains likely that certain voters will be unable to comply with the cure process and will therefore have their votes discarded unless this Court orders otherwise.

33. The State Board's notice does not address what to do about voters who passed away after election day (and I know that at least one voter targeted by Judge Griffin has since tragically died, *see supra* ¶21). The notice does not, for example, propose to alert a deceased voter's family or estate about the need for a cure. Nor does the notice address whether family or other individuals who independently learn of a deceased voter's threatened disenfranchisement can submit photo identification on the voter's behalf (even assuming they happen to have the voter's identification) or whether someone other than the voter can complete an exception form.

34. Also according to the State Board's notice—and as the state courts have required, *Griffin v. North Carolina State Board of Elections*, 2025 WL 1090903, at \*3 (N.C. Apr. 11, 2025)—the 30-day cure period will begin when notice is *mailed*. The NCDP has learned of concerns from multiple voters living on military bases that notices will not reach them in time. They report that mail delivery on these bases is often delayed for security purposes. Overseas voters have likewise expressed concern that delays with

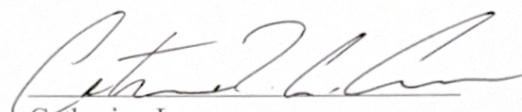
international mail will not allow adequate time to respond to the notices, even if they receive the notices within 30 calendar days.

35. Additionally, many voters who cast overseas ballots on election day are students who were studying abroad during the fall semester. Many of these students may no longer receive mail at their temporary overseas address. While they may be registered to vote at their college or university and maintain an on-campus mailing address, many will not have access to that address, either, once the spring semester ends (e.g., because they are moving within the campus, graduating, returning to their parents' homes for summer jobs, moving to internship or study abroad housing, or doing something else away from campus). In addition to my work for NCDP, I am a Senior Lecturing Fellow at Duke University, so I know that Duke's exam schedule ends (and students will be leaving campus) on April 27—just when the State Board plans to send its initial mailing. Similarly, final exams at NC State are scheduled for April 24-30 (*see* <https://studentservices.ncsu.edu/calendars/academic-calendar/>), such that I would expect many students from NC State to depart campus shortly thereafter.

36. If Judge Griffin successfully obtains a state court order instructing the State Board to expand the scope of his protests and modify its proposed cure process, these concerns will be exacerbated. Increasing the number of voters who must cure (as Judge Griffin wants) heightens the risk that eligible voters will be disenfranchised because they never receive notice. And Judge Griffin has demanded that those voters he accuses of never having resided in North Carolina be disenfranchised without any notice at all, increasing

the chance that eligible voters who he erroneously accused of not residing in North Carolina will be disenfranchised.

I declare under penalty of perjury that the foregoing is true and correct. Executed April 21, 2025.



Catherine Lawson

# EXHIBIT A

# At least 16 'never residents' who are poised to have ballots tossed have actually lived in North Carolina

A preliminary review shows many of the 260 voters stand to have their ballots wrongly removed. The North Carolina Court of Appeals is expected to soon direct elections officials to toss out the votes.



BRYAN ANDERSON

APR 14, 2025

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Democratic Court of Appeals Judge Toby Hampson and Republican Judges John Tyson and Fred Gore hear an ongoing Supreme Court election dispute during a hearing on Friday, March 21, 2025.

*Reader's Note: In the public interest and given the urgency of the subject, the paywall for this story is being lifted. To support my continued reporting, please consider a [paid subscription](#).*

*Anderson Alerts here.* Step-by-step instructions for existing unpaid readers is [available here](#) you value this kind of thorough reporting, please consider helping to sustain it.

At least 16 North Carolina voters from 10 different counties are poised to have their ballots immediately removed from the Supreme Court tally without any opportunity to address concerns a Republican candidate has with their ballots, a preliminary *Anderson Alerts* review of [the challenged voters](#) shows.

To overturn an apparent 734-vote defeat to Democratic Supreme Court Justice Allie Riggs, Republican Court of Appeals Judge Jefferson Griffin contested the ballots of 260 North Carolinians, labeling them as “never residents.”

The North Carolina Court of Appeals [ruled this month](#) that the State Board of Elections must remove all 260 voters from the count. The state Supreme Court [upheld](#) that decision.

In response, Riggs appealed to federal court, where a Trump-appointed judge ruled over the weekend that Judges **Fred Gore** and **John Tyson** may proceed with directing state elections officials to remove the so-called “never residents” from the vote count.

“The totality of the circumstances indicates the domicile of the parents of these absentee, ‘Never Resident’ voters was overseas,” Gore and Tyson had concluded. “These ‘Never Resident’ voters, who were born to parents overseas, were never brought to North Carolina to reside during the entirety of their eighteen-year dependency as minors, and their domicile is overseas.”

But a review of public records, news clips, social media posts, and interviews show many of those people have indeed lived in the state, with some having spent their entire childhood in North Carolina, continuing to pay property taxes or working in the state.

The at-risk voters include military servicemembers based out of Fort Bragg and Camp Lejeune, college professors, young adults working or studying abroad, a former D1 swimmer and even an aspiring actress.

**Cameron Avila**, a postal worker at Marine Corps Base Camp Lejeune in Jacksonville, has his vote challenged, as does Capt. **Jacob Sugg**— a UNC-Wilmington alum who’s worked for the Marines since at least 2019.

They’re far from the only ones whose votes face imminent risk.

**Abdulai Conteh**, who has served as a U.S. Army mechanic since 2017 and is based out of Fort Bragg, also faces the same challenge to his ballot.

**Josey Wright**, a Pitt County voter, stands to have her Supreme Court vote discarded.

“I lived in Pitt County until I was 18, when I moved to England for my undergrad, although I was back in NC most summers/Christmas vacations,” Wright told *Anderson Alerts*. “I am currently still in Cambridge working on my PhD but have voted in North Carolina elections as an overseas voter since I moved in 2017.”

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Wright has voted without issue since 2018. She also noted she worked at Duke University one summer through a residential program and continues to travel back to North Carolina two to three times per year to be with her family.

“It’s ridiculous that they’re trying to discount so many people who have every legal right to vote in NC elections,” Wright said.

**Neil McWilliam**, an Orange County voter, taught at Duke's Trinity College of Arts Sciences from 2003 to 2023 and is a naturalized citizen. Since retiring from Duke, he lived in France. He's infuriated to now find himself on Griffin's list.

"As appears to be the case with much of Mr. Griffin's questioning of the result for the NC Supreme Court, the challenge to my vote is spurious," McWilliam told *Anderson Alerts*. "I hope this is of help, though in the current climate, it is hard to be confident of a just outcome."

Wake County Board of Elections Member **Gerry Cohen** said the challenged ballots are likely the result of the voters checking a box on a [Federal Post Card Application](#) that read, "I am a U.S. citizen living outside the country, I have never lived in the United States." Cohen said voters may very well have checked the box in error.

If the Court of Appeals retains its position that such ballots ought to be immediately discarded, these voters and others stand to be left without any remedy.

*Anderson Alerts* identified 16 voters who were born in North Carolina, resided in North Carolina, still live in North Carolina, or some combination of the three. Additional voters may very well fall into these groups, but further review would be needed to reach a definitive conclusion.

Here's the other "never resident" voters who stand to have their ballots wrongfully discarded:

- **Vidyaranya Gargeya (Guilford County):** A retired professor who [taught at UNC Greensboro](#) for 30 years who, according to the school, has visited every college in the state. He's paid property taxes at the same suburban Guilford County home he's owned since 2003, according to public records. And voting records show he's voted in-person on Election Day eight times without issue, and has voted in every midterm and presidential general election since 2006. He appears to have cast a

overseas mail-in ballot for the 2024 election. And his nextdoor neighbor confirmed on Saturday that Gargeya does indeed live next to him.

- **Josiah Young (Jackson County):** Young was raised in Webster, played basketball for Jackson County Early College and runs a **drone photography business** based in western North Carolina. Young, who briefly studied abroad in Spain at the time of last year's election, said he was born and raised in Jackson County and has never been out of the country for more than three to four months at a time. He said it's possible he checked the wrong box on an FPCA application, but can't remember. He said he voted for Riggs. He's now livid that he's left with no recourse to get his vote counted. "It just shows that there's really no interest in them trying to find out if these ballots are actual citizens or not," Young said. "It's clearly just to give [Griffin] an advantage in this election. If they wanted to look into this even just a little bit, it's pretty clear that my residence is in Jackson County. It's really not that hard to figure that out."
- **Michelle Carrillo-Corujo (Guilford County):** Corujo grew up in North Carolina. She attended Crestdale Middle School in Matthews in 2015 and has largely remained in North Carolina ever since. She graduated from UNC-Greensboro last year with a degree in political science and recently moved to the Netherlands for further academic pursuits.
- **Holly Arrowood (Henderson County):** Arrowood has been a North Carolina voter since 2008 and has cast a ballot in-person on Election Day seven times. She also appears to still live in Chapel Hill.
- **Jean-Louis Mondon (Henderson County):** Mondon has been a U.S. citizen since 1986, has long lived in North Carolina and has voted in the state since at least 1994. He taught English, French and Spanish at Blue Ridge Community College from 2005 to 2009, runs a Christian blog and is a private tutor and linguist.
- **David Eberhard (Orange County):** Eberhard is a longtime neurologist and taught at UNC-Chapel Hill from 2011 to 2016.

- **Austyn Blamy (Union County):** Blamy graduated from high school at Cuthbert High School in Waxhaw and has been a seasonal swim coach there since 2018, according to her LinkedIn page. Blamy was also a D1 athlete from 2023-2024 for Liberty University's swim team.
- **Ayse Babahan (Wake County):** Babahan was born in North Carolina, but grew up in Istanbul. She graduated from the Stella Adler Studio of Acting in New York and is now an actress living overseas.
- **Vicki Brent (Wake County):** Brent attended Millbrook High School in Raleigh from 2017 to 2021 and served on the Wake County Black Student Coalition.
- **Eric Hoffman (Wake County):** Hoffman attended UNC-Chapel Hill from 2014 to 2016 and got a master's degree in business administration and has been a registered North Carolina voter since 2011. He's since worked out of Holly Springs and Australia.
- **Sergio Cutiva Valencia (Watauga County):** Valencia is an Appalachian State University alum who graduated in 2022.

Based on public records, at least 11 additional voters in Griffin's "never resident" protest appeared to have lived or currently live in North Carolina. But a more robust review for them and others would be needed.

*Update: This story was updated at 1:30 p.m. on Monday, April 14, to include perspective from Josiah Young, a "never resident" listed on Griffin's protest who spent his entire childhood in Jackson County and has never been overseas for more than three to four months at a time.*

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Stanley Toney 5d

The only "quick" remedy I can think of is that one of these people, or more, need to sue the state of elections and or the North Carolina Supreme Court.

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Gina 5d

Insanity!

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